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October 18, 2019

**VIA E-TARIFF**

The Honorable Kimberly D. Bose  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426

Re: San Diego Gas & Electric Company, Docket Nos. ER19-221-000 and  
ER19-221-001 – Offer of Settlement

Dear Secretary Bose:

In accordance with Rule 602 of the Federal Energy Regulatory Commission’s Rules of Practice and Procedure, 18 C.F.R. § 385.602 (2018), San Diego Gas & Electric Company (“SDG&E”) submits for electronic filing in the above-referenced proceeding the documents listed below. Please transmit a copy of these documents to Administrative Law Judge Andrea McBarnette in accordance with Rule 602(b)(2)(i).

The Offer of Settlement (“Settlement”) is intended to resolve all issues set for hearing with respect to SDG&E’s Fifth Transmission Owner Formula (“TO5 Formula”) rate mechanism.<sup>1</sup> The Commission Trial Staff and all Intervenors have indicated that they either support or do not oppose resolution of this proceeding according to the terms and conditions described in the Settlement.

In accordance with Rule 602(c)(1), the following documents are attached:

1. The Explanatory Statement;
2. The Offer of Settlement, consisting of Attachment A (Depreciation Rates and Amortization Periods) and Attachment B (Exhibits List and exhibits comprising, *inter alia*, pro forma clean and redline versions of Appendix VIII to SDG&E’s Transmission Owner tariff); and

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<sup>1</sup> *San Diego Gas & Electric Co.*, 165 FERC ¶ 61,276 (2018).

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3. Certificate of Service.

Consistent with Rule 602(f), comments on the Offer of Settlement are due on November 7, 2019, and reply comments are due on November 18, 2019.

SDG&E respectfully submits that the Settlement is fair and reasonable and in the public interest and thus asks that Judge McBarnette certify this Settlement to the Commission and that the Commission approve the Settlement without condition or material modification and accept for filing SDG&E's revised tariff.

Please contact me if you have any questions regarding this filing.

Respectfully submitted,

*/s/ Christopher M. Lyons*

Christopher M. Lyons

Attorney for

San Diego Gas & Electric Company

cc: CALJ Carmen A. Cintron  
ALJ Andrea McBarnette  
Service List – Docket No. ER19-221